



FCC – Protecting Consumers from Unauthorized Carrier Changes and Related Unauthorized Charges (CG Docket No. 17-169, DA/FCC-17-91)
Comment from Istonish: Innovative Approaches

Current Issue: Some communications companies and their TPV vendors are violating the regulations in the following ways: 1) Provisioning phone or other related entertainment, bandwidth or equipment rental services without the authorization of the consumer, and 2) verification service providers are manipulating verification records to fraudulently reflect affirmative confirmations. Other manifestations of abuse include practices that make it very difficult for consumers to disconnect or cut back service packages or resolve issues or complaints. These abuses continue to make the case for ongoing third party confirmations with the goal of keeping communications providers honest.

As a major provider of Third Party Verification services to a number of communications companies, we understand there is no reason EVER, that a TPV vendor should be manipulating verification outcome records. Arrangements that reward the TPV vendor for affirmative confirmations reflect conflicting incentives that are at odds with the concept of an INDEPENDENT verification.

Possible Remedies to Address the Issue:

1. In the 21 years or so since TPV was mandated in the communications industry, new technologies have emerged that can enable verifications to be completed using additional modes other than voice and electronic documents. These include video, chat and text. Flexibility to allow additional modes of confirmation can make it easier and faster for verifications to take place.
2. Mobile technology and emerging cyber security practices can enable personalized, secure confirmations to be completed on mobile devices, relying on two factor authentications, including things like fingerprint validation for TPV's. This can enable better validation of the identity of the consumer who is involved in making a service change decision.
3. The industry should not confirm their own sales activity. Our experience indicates that when third parties perform confirmations, consistent disclosure content is used, and definitive client responses are consistently gathered.
4. The FCC could assess significant penalties on TPV companies or communications companies found to be fraudulently manipulating verification records.

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